

**MEMO ENDORSED****U.S. Department of Justice***United States Attorney
Southern District of New York*RECEIVED IN CHAMBERS
OF NAOMI REICE BUCHWALD

JUL - 1 2008

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 30, 2008

BY FACSIMILE UNITED STATES DISTRICT JUDGE

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 2270
New York, New York 10007

**USDS SDNY
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Re: United States v. Harry Vargas et al.
07 Cr. 1099 (NRB)

MEMO ENDORSED

Dear Judge Buchwald:

The next pretrial conference is scheduled for Wednesday, July 2, 2008, at 4:00 p.m. Discovery has been produced, which included many audio CDs, as well as additional discovery. The parties have been reviewing discovery, and the Government is responding to additional discovery requests. The parties have not completed the review of discovery. Therefore, the parties respectfully request that the pre-trial conference scheduled for July 2, 2008, be adjourned until July 21, 2008, at 3:30 p.m. to allow the parties to continue discussions about a possible resolution to this case.

If Your Honor grants this request, then the Government respectfully requests that the Court exclude time from July 2, 2008, until July 21, 2008, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will allow the defendants and the Government time to

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continue discussions about a possible pre-trial resolution to this case. Defense counsel consents to this request for an adjournment.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By: 

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Encl.

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